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July 24, 2008

2008

VIA FACSIMILE
Hon. Colleen McMahon
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 640
New York, New York 10007

MEMO ENDORSED

Re: AstraZeneca AB, et al. v. Dr. Reddy's Laboratories, Ltd., et al.
07-civ-6790 (CM)(FM)

Dear Judge McMahon:

We represent plaintiffs AstraZeneca AB, et al. ("AstraZeneca") in the above matter. We write regarding the July 9, 2008 motion for summary judgment filed by defendants Dr. Reddy's Laboratories, Ltd., et al. ("DRL").

AstraZeneca respectfully requests a further 9 day extension of time to file its opposition to DRL's summary judgment motion from the current deadline of July 30, 2008 to August 8, 2008. AstraZeneca has made one previous request to extend its time to answer by one week, and that extension was granted. At that time, the Court also granted a one week extension of time for DRL to file its reply.

DRL has not consented to the additional extension. DRL requested that AstraZeneca include with its request the following paragraph stating its reasons for not consenting to a further extension:

DRL consented to AstraZeneca's first request for an extension but DRL does not consent to the current request. DRL has informed us that any further delay in the launch of DRL's generic product

*I do NOT
consent*
NO
Colleen M. McMahon
7/25/08

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July 24, 2008
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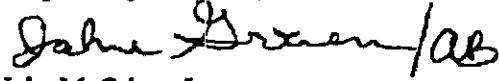
would have a significant negative impact on DRL's business. In addition, we have been told that the extension now sought by AstraZeneca would cause hardship to DRL's counsel, Mr. Weinstein, because the requested extension will have the effect of cutting directly into the days previously budgeted by Mr. Weinstein in order to prepare for and celebrate his daughter's wedding. DRL has also asked us to inform Your Honor that the expert declaration submitted by DRL with its Motion for Summary Judgment is almost identical to the expert declaration submitted by DRL in this action in November of 2007.

AstraZeneca requests this additional extension because it requires additional time to consult with the inventors of the patents-in-suit and AstraZeneca scientists who are located in Sweden, and its expert witnesses, who are in England. This is a case-dispositive motion, involving complex issues of fact requiring an in-depth analysis of the chemistry of DRL's product.

AstraZeneca respectfully submits that DRL's reasons for refusing to consent to this extension are not valid. Even if DRL's expert declaration is almost identical to one submitted in November 2007, AstraZeneca needs time to analyze it in light of the ANDA and DMF documents produced in May 2008, and to consult with its experts regarding the opinions stated in the declaration. Mr. Weinstein's schedule can be easily accommodated by granting DRL an appropriate extension to file its reply. DRL's assertion that its business would suffer a "significant negative impact" is unsupported. As far as AstraZeneca is aware, DRL has not received FDA approval to market its ANDA Product. Consequently, this litigation is not causing any delay.

AstraZeneca therefore respectfully requests the Court to approve the requested extension. AstraZeneca will work diligently to meet the revised schedule. Once AstraZeneca's opposition has been served, DRL can seek an appropriate extension of its time to reply.

Respectfully submitted,


John M. Griem, Jr.

cc: Louis H. Weinstein, Esq.
Michael Imbacuan, Esq.
Counsel for Defendants Dr. Reddy's Laboratories, Ltd., et al. (via facsimile)